

**LOCAL BANKRUPTCY FORM 9013-3**

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

**IN RE:**

Mitsa Katsiotis

**CHAPTER** 13

**CASE NO.** 5-15-bk-05505-JJT

**Debtor(s)**

Wilmington Savings Fund Society, FSB, d/b/a  
Christiana Trust, not individually but as trustee for  
Pretium Mortgage Acquisition Trust

**ADVERSARY NO.**       ap-        
**(if applicable)**

**Plaintiff(s)/Movant(s)**

vs.

Mitsa Katsiotis

**Nature of Proceeding:** Motion for Relief

Charles J DeHart, III (Trustee)

**Defendant(s)/Respondent(s)**

**Document #:** 30

**REQUEST TO CONTINUE HEARING/TRIAL WITH CONCURRENCE<sup>1</sup>**

This request must be filed at least twenty-four (24) hours prior to the hearing. All requests must be approved by the Court. Submitting a request is not an automatic continuance.

The undersigned hereby requests a continuance with the concurrence of the opposing party (parties). This is a first request for a continuance.<sup>2</sup>

Reason for the continuance.

Parties are attempting to resolve the matter and are requesting 30 days to do so.

Contemporaneous with the filing of this request, the undersigned has served a copy of this request upon all counsel participating in this proceeding.

Dated: June 19, 2018

Steven P. Kelly

Attorney for Movant

Name: Stern & Eisenberg, P.C.

Phone Number: 215-572-8111 Ext. 1125

<sup>1</sup> No alterations or interlineations of this document are permitted.